

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA

In Re:	)	CASE NO. 20-00662-jw
	)	
Watertech Holdings, LLC,	)	CHAPTER 11
	)	
Debtor.	)	
	)	

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**LIMITED OBJECTION OF COLETTE WINTERS TO DEBTOR'S MOTION FOR  
ORDER ESTABLISHING BIDDING AND OTHER PROCEDURES IN CONNECTION  
WITH THE SALE OF ASSETS OF THE DEBTOR AND GRANTING PROTECTIONS  
TO THE PROPOSED PURCHASER AND MEMORANDUM IN SUPPORT**

COMES NOW Colette Winters, in her individual capacity and as guardian for her children ("Winters"), by and through her undersigned counsel, and files this limited objection (the "Limited Objection") to Watertech Holdings, LLC's ("Debtor") *Motion for Order Establishing Bidding and Other Procedures in Connection With the Sale of Assets of the Debtor and Granting Protections to the Proposed Purchaser and Memorandum in Support* (the "Bid Procedures Motion") (Doc. 7). The hearing on the Bid Procedures Motion is currently scheduled for April 1, 2020, with responses due March 23, 2020. On March 23, 2020, the Debtor filed a motion (Doc. 37) to continue the hearing on the Bid Procedures Motion to April 15, 2020 and to extend the response deadline to April 6, 2020, to which Winters has consented.

Winters hereby files this Limited Objection in an abundance of caution and as a prophylactic measure to preserve her concerns regarding the proposed bid procedures and sale terms. Winters reserves her right to file a further or supplemental objection upon review of the proposed bid procedures and sale terms.

NELSON MULLINS RILEY & SCARBOROUGH L.L.P.

By: /s/George B. Cauthen  
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Attorneys for Collette Winters

Columbia, South Carolina  
March 23, 2020

**CERTIFICATE OF SERVICE**

I the undersigned administrative assistant with the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Collette Winters, do hereby certify that I have served all parties in this action with a copy of the pleading(s) hereinbelow specified by either mailing a copy of the same by United States Mail, postage prepaid, or electronic service through the court's CM/ECF case filing system to the following:

Pleadings: Limited Objection of Colette Winters to Debtor's Motion for Order Establishing Bidding and Other Procedures in Connection With the Sale of Assets of the Debtor and Granting Protections to the Proposed Purchaser and Memorandum in Support

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/s/Joan A. Kishline  
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Columbia, South Carolina

March <sup>23</sup>\_\_\_\_, 2020